



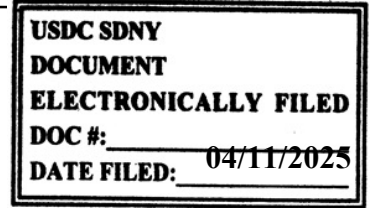
U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street

New York, New York 10007

April 10, 2025



MEMO ENDORSED

By ECF

The Honorable Katharine H. Parker
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Conklin, et al. v. United States Postal Service*, 23 Civ. 7122 (SHS)

Dear Judge Parker:

This Office represents the United States Postal Service (the “Government”), defendant in the above-referenced action brought pursuant to the Fair Labor Standards Act, 29 U.S.C. § 207. By Order dated November 12, 2024, the Court scheduled a settlement conference for February 18, 2025, with pre-conference submissions due no later than February 11, 2025. *See* ECF 53. Upon the parties’ request, the Court issued an Order on February 5, 2025, adjourning the settlement conference to April 22, 2025, with pre-conference submissions due by April 15, 2025. *See* ECF 65.

With plaintiffs’ consent, the Government respectfully requests a brief adjournment of the settlement conference—to May 8, 2025, anytime during the week of May 12, 2025, or at the Court’s earliest convenience thereafter—and a concomitant adjournment of the deadline for the pre-conference submissions. The reason for this request is that Plaintiffs recently provided the Government with a settlement demand, including detailed calculations. The Government is reviewing Plaintiffs’ calculations and has already identified one important issue that the parties require time to address before the conference. In addition, the Government has requested that Plaintiffs provide additional information regarding Plaintiffs’ attorney’s fees and costs. Plaintiffs require additional time to compile the requested information, after which the Government will require some time to review it. The parties are hopeful that, with the requested additional time, they will be able to narrow the disputed issues, which should make the settlement conference more productive. Finally, an adjournment will be helpful because (1) the undersigned will be unable to work on these issues next week on account of international travel, and (2) the agency official most knowledgeable about this case is now unavailable on April 22.

This is the Government’s second request for an adjournment of the settlement conference. The Court granted the first request. *See* ECF 65. I thank the Court for its consideration of this request.

Respectfully,

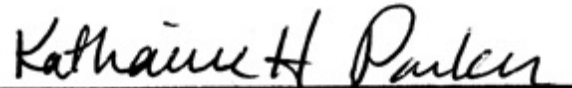
MATTHEW PODOLSKY
Acting United States Attorney
Southern District of New York

By: /s/ Ilan Stein
ILAN STEIN
Assistant United States Attorney for the
Southern District of New York
Tel.: (212) 637-2525

cc: Plaintiffs' counsel (via ECF)

APPLICATION GRANTED: The settlement conference in this matter scheduled for Tuesday, April 22, 2025 at 10:00 a.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York is hereby rescheduled to **Thursday, May 22, 2025 at 2:00 p.m.** Parties must attend in-person with their counsel. Corporate parties must send the person with decision making authority to settle the matter to the conference. The parties are instructed to complete the Settlement Conference Summary Report and prepare pre-conference submissions in accordance with the Judge Parker's Individual Rules of Practice. Pre-conference submissions must be received by the Court no later than **May 15, 2025 by 5:00 p.m**

APPLICATION GRANTED



Hon. Katharine H. Parker, U.S.M.J.

04/11/2025